

### III. REMARKS

Claims 1, 3-8 and 10-15 are pending in this application. Claims 1, 4, 5, 7, 8, 12, 14 and 15 are amended. Claim 2 is canceled. Claim 9 was previously canceled. Claims 1-15 are rejected under 35 USC 103(a) as allegedly being unpatentable over Bandat et al. (US 6816902 B1) ("Bandat") in view of Deborin et al. (*Continuous Business Process Management with HOLOSOFX BPM Suite and IBM MQSeries Workflow*) ("Deborin") and further in view of Dewan et al. (*Workflow Redesign Through Consolidation...*) ("Dewan"). Applicant respectfully traverses the 35 USC 103(a) rejections for the reasons provided below.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

#### A. REJECTION OF CLAIMS 1-15 UNDER 35 USC 103(a)

In the Office Action, claims 1-15 under 35 USC 103(a) are rejected as allegedly being unpatentable over Bandat in view of Deborin further in view of Dewan. Specifically regarding the Office's rejections of claim 1 (and similarly claims 5, 8 and 12), Applicant submits the combined references fail to teach or suggest each and every feature of claim 1 (and similarly claims 5, 8 and 12), as amended.

Claim 1 (and similarly claims 5, 8 and 12), as amended, recites: "a

workflow server connected to said operating computer terminals in a network to manage the workflow, wherein said workflow server consolidates information necessary for processing multiple consecutive nodes to be processed by at least one participant operating one of said operating computer terminals, wherein when a form to be circulated in the workflow reaches a first one of the multiple consecutive nodes to be processed by the at least one participant, said workflow server consolidates information necessary for the at least one participant's determination, and wherein said workflow server generates a new form based on the consolidated information and sends the consolidated information to the operating computer terminal." Support for these amendments may be found, for example, in the specification at paragraph [0022].

The Office admits Bandat does not teach or suggest "wherein when a form to be circulated in the workflow reaches a first one of the multiple consecutive nodes to be processed by the at least one participant, said workflow server consolidates information necessary for the at least one participant's determination" and cites to Deborin at pages 12, 110, 248 and 19 and takes Official Notice in support of its rejection. Deborin does not teach or suggest this feature. Dewan does not cure the deficiency.

Deborin discusses "consolidate[ing] tasks performed by the same role into a single activity." In contrast, Applicant's claimed invention "consolidates information necessary for...participant's determination." "Task" is not synonymous with "information." In common usage, a "task" is an activity whereas "information" is knowledge. The "consolidation" recited by Applicant's

invention is “necessary” for “participant's determination.”

Accordingly Bandat, Deborin and Dewan do not teach or suggest each and every feature of applicant's claimed invention. Therefore, Applicant submits that claim 1 (and similarly claims 5, 8 and 12) is patentable over Bandat, Deborin, and Dewan whether viewed alone or in any combination.

With respect to the dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

#### IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

/David E. Rook/

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